

Chairman Mary D. Nichols and Executive Officer Richard Corey
California Air Resources Board
1001 I Street
Sacramento, CA 95814

June 18, 2015

Dear Chairman Nichols and Executive Officer Corey:

The SB 535 Coalition, and other supportive organizations, appreciate the intensive and extensive work performed by ARB staff preparing the new full Funding Guidelines discussion draft released earlier this week, and are glad to see the two 2014 Interim Guidance documents on Expenditure Records and Fiscal Procedures and Investments to Benefit Disadvantaged Communities together in one document. We are in the process of formulating comments in response to this release, but under the severely compressed time frame established by ARB felt it was in our best interests to file this preliminary comment letter while we finalize our analysis and solicit signatories of supporting organizations.

We want to express our dissatisfaction with process adopted by ARB for public participation and its severely compressed timeframe. Several aspects of the current process significantly restrict the ability for community-based organizations and other representatives of disadvantaged communities to participate in the deliberation process and provide input for consideration, including:

- The release of the Funding Guidelines “discussion draft” three business days prior to the public workshop, and eight business days prior to the deadline for public comment
- The offering of only one workshop in Sacramento, with a non-interactive webcast
- The fact that both the only scheduled workshop and period for public comment occur *before* the release of the revised Funding Guidelines draft
- The lack of clarity about how much time will be provided between the release of the revised Funding Guidelines draft and the ARB Board Meeting on July 23rd, where the finalization of the guidelines will be considered

Considering that there have been very few revisions made to the Funding Guidelines discussion draft when compared to the Interim Guidance document finalized in November, 2014, it would seem the appropriate time for workshops and public comment would be after the release of the revised draft, which is currently scheduled to be released between the close of public comment on June 29, 2015 and the ARB Board Meeting on July 23, 2015. We would suggest that ARB reconsider their proposed timeline and instead adopt a process similar to last year’s finalization of the Interim Guidance documents in order to provide for more interactive opportunities and time for public comment.

2014 Public Participation Timeline
Interim Guidance for Investments in Disadvantaged Communities

08/22/14	Interim Guidance Draft
08/25/14	WORKSHOP: Fresno
08/26/14	WORKSHOP: Los Angeles
09/03/14	WORKSHOP: Oakland
09/15/14	Public Comment Deadline
09/18/14	Board Consideration

We would like to propose an alternative. By moving the finalization of guidelines to the August 20th ARB Board Meeting and scheduling workshops in Northern, Central and Southern California in late July or early August, ARB would not only provide a more reasonable timeframe to consider and respond to public comments, but would also allow for community representatives across the state to attend public workshops and contribute their knowledge and experience to better inform ARB's final decision-making process.

If the current public process is not reconsidered, only a small percentage of the communities most affected by this guidance will be able to contribute to this important discussion. Additionally for coalitions who wish to build broad support for their analysis, more time is needed to circulate letters and provide time for other organizations to obtain official approval of support. Our experience indicates that the entire eight business days allotted for the public comment period is very insufficient for most organizations to study and make determinations about recommendations expressed in comment letters.

We hope that you will seriously consider this request to revise and expand your timeframe, so that a robust and rewarding public participation process may occur.

Sincerely,

Mari Rose Taruc
State Organizing Director
Asian Pacific Environmental Network

Katelyn Roedner Sutter
Environmental Justice Program Director
Catholic Charities, Diocese of Stockton

Mark Masaoka
Policy Director
Asian Pacific Policy & Planning Council
(AP3CON)

Robert García
Founding Director and Counsel
The City Project

Matthew Read
Statewide Government Relations Director
Breathe California

Bill Magavern
Policy Director
Coalition for Clean Air

Jeanie Ward-Waller
Policy Director
California Bicycle Coalition

Jonathan Parfrey
Executive Director
Climate Resolve

Ann Sewill
Vice President, Housing and Economic
Development
California Community Foundation

D. Malcolm Carson
General Counsel and Policy Director for
Environmental Health
Community Health Councils

Amy Vanderwarker
Co-Director
California Environmental Justice Alliance

Damien Goodmon
Executive Director
Crenshaw Subway Coalition

Megan Kirkeby
Policy Director
The California Housing Partnership

R. Bong Vergara
Director
CYPHER

mark! Lopez
Director
East Yard Communities for Environmental Justice

Gisele Fong, PhD
Executive Director
EndOil / Communities for Clean Ports

Stella Ursua
President
Green Education Inc.

Alvaro S. Sanchez
Program Manager, Environmental Equity
The Greenlining Institute

Lisa Hershey
Sustainable Communities Coordinator
Housing California

Shayla Myers
Staff Attorney
Legal Aid Foundation of Los Angeles

Ben Russak
Policy Analyst
Liberty Hill Foundation

Roxana Tynan
Executive Director
Los Angeles Alliance for a New Economy
(LAANE)

Eric Bruins
Planning & Policy Director
Los Angeles County Bicycle Coalition

Denny Zane
Executive Director
Move LA

Manal J. Aboelata
Managing Director
Prevention Institute

Marybelle Nzegwu
Staff Attorney
Public Advocates Inc.

Joel Ervice
Associate Director
Regional Asthma Management & Prevention
(RAMP)

Gordon Snead
Director
SBCC Thrive LA

Sissy Trinh
Executive Director
Southeast Asian Community Alliance (SEACA)

Joshua Stark
State Policy Director
TransForm

Sandra McNeill
Executive Director
T.R.U.S.T. South LA